

EXHIBIT B

Lamkin, Rachael

From: Randall Garteiser <rgarteiser@ghiplaw.com>
Sent: Tuesday, February 11, 2025 1:00 PM
To: Lamkin, Rachael
Cc: Rene Vazquez; ghpam@ghiplaw.com; EXT Smith, Melissa (T-Mobile); McKellar Karr
Subject: : AT v. Starbucks - Rule30(b)(1) percipient witness depo of Lamkin
Attachments: 2024.12.12 Lamkin to Garteiser re AT Response to D Set Two.pdf; 2024.11.19 Lamkin to Garteiser Discovery Set One.pdf

[EXTERNAL EMAIL]

Counsel for Starbucks:

Please provide us some dates for Lamkin's deposition. Does February 25, 26, or March 4, or 5 work? Please let us know so we can send a deposition notice pursuant to Rule 30(b)(1). Rachael Lamkin has provided testimony in a declaration about conversations she had with former bank employees allegedly associated with Plaintiff AT. Also, she stated in a declaration to the court about her personal investigations into the chain of title of documents she claims are authentic from other sources outside the documents of client Starbucks possession and control. This includes research into routing numbers for banks and location of banks, among other items such as Court documents from CA county courts. AT wants to explore her scope of testimony as a **percipient witness at trial and to determine why she believes should not be disqualified from representing Starbucks since she is a biased witness in this litigation and has filed legal allegations against at least management person outside of this litigation.**



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On Feb 11, 2025, at 2:21 PM, Lamkin, Rachael <rachael.lamkin@bakerbotts.com> wrote:

Rene', Randy,

As you know, the parties had multiple meet and confers in December regarding AT's responses to Starbucks discovery Set One and Set Two. We intend to move to compel this week. In the spirit of cooperation, we attach our correspondence regarding this issue and ask one last time that AT provide adequate discovery responses to Starbucks RFAs and Interrogatories. We will move by Friday at the latest absent your promise to supplement adequately by that date.

Rachael